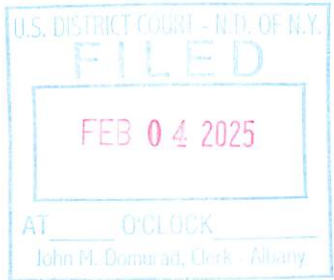


IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF NEW YORK

**UNITED STATES OF AMERICA**

**v.**

**MUFID FAWAZ ALKHADER,**



**Defendant.**

) Criminal No. 1:25-CR-00007 (AMN)  
)  
) **Information**  
)  
)  
) Violations: 18 U.S.C. § 371  
) [Conspiracy to Commit an  
) Offense Against the United  
) States]  
)  
) 18 U.S.C. § 247(a)(2) and  
) (d)(3) [Obstruction of Free  
) Exercise of Religious Beliefs  
) with a Dangerous Weapon]  
)  
) 18 U.S.C. § 924(c)(1)(A)(ii)  
) [Brandishing a Firearm in  
) Furtherance of a Crime of  
) Violence]  
)  
)  
) Three Counts and Forfeiture Allegation  
)  
) Counties of Schenectady & Albany  
) Offenses:

**THE UNITED STATES ATTORNEY CHARGES:**

**COUNT 1**

**[Conspiracy to Commit an Offense Against the United States]**

1. Between on or about November 1, 2023 and on or about November 6, 2023, in Schenectady and Albany Counties in the Northern District of New York, and elsewhere, the defendant, **MUFID FAWAZ ALKHADER**, and Andrew Miller, knowingly and willfully conspired and agreed with each other to commit an offense against the United States, to wit, a violation of Title 18, United States Code, Section 922(a)(6).

**Object of the Conspiracy**

2. It was a part and an object of the conspiracy that the defendant, **MUFID FAWAZ ALKHADER** (“**ALKHADER**”), and Andrew Miller (“Miller”), in connection with the acquisition of a firearm from a licensed dealer, would and did knowingly make false and fictitious oral and written statements intended and likely to deceive such dealer, with respect to facts material to the lawfulness of the sale and disposition of such firearm, in violation of Title 18, United States Code, Section 922(a)(6).

**Overt Acts**

3. In furtherance of the conspiracy and to effect the object of the conspiracy, the following overt acts, among others, were committed in the Northern District of New York:

a. On or about November 5, 2023, **ALKHADER** and Miller drove to a gas station in Clifton Park, New York, where **ALKHADER** withdrew \$500 in cash from an ATM to pay for a firearm, plus an additional \$200 or \$300 to compensate Miller for purchasing the firearm.

b. On or about November 5, 2023, **ALKHADER** and Miller drove to a Federal Firearms Licensee (FFL) in Albany County, New York, where **ALKHADER** selected a Kel-Tec KS7 12-gauge pump shotgun bearing serial number QLF02 (the “Kel-Tec Shotgun”) to purchase.

c. On or about November 5, 2023, in connection with the purchase of the Kel-Tec Shotgun, and at **ALKHADER**’s request, Miller completed and signed a Firearms Transaction Record (ATF Form 4473), and in doing so falsely responded “Yes” to the question, “Are you the actual transferee/buyer of all of the firearm(s) listed on this form and any continuation sheets (ATF Form 5300.9A)?” even though **ALKHADER** was the actual buyer of the firearm.

d. On or about November 6, 2023, **ALKHADER** and Miller returned to the FFL and retrieved the Kel-Tec Shotgun.

e. On or about November 6, 2023, **ALKHADER** and Miller drove to Miller's residence in Schenectady, New York, where Miller gave **ALKHADER** the Kel-Tec Shotgun and a duffle bag to conceal the Kel-Tec Shotgun.

All in violation of Title 18, United States Code, Section 371.

**COUNT 2**  
**[Obstruction of Free Exercise of Religious Beliefs with a Dangerous Weapon]**

4. On or about December 7, 2023, in Albany County in the Northern District of New York, the defendant, **MUFID FAWAZ ALKHADER**, intentionally obstructed, and attempted to obstruct, by force and threat of force, including by threat of force against religious real property, any person in the enjoyment of that person's free exercise of religious beliefs, in and affecting interstate commerce, and such acts included the use, attempted use, and threatened use of a dangerous weapon, that is, the defendant, **MUFID FAWAZ ALKHADER**, fired two rounds in the air from a Kel-Tec KS7 12-gauge pump shotgun bearing serial number QLF02 on the walkway to the front of Temple Israel at 600 New Scotland Avenue, Albany, New York, in violation of Title 18, United States Code, Section 247(a)(2) and (d)(3).

**COUNT 3**  
**[Brandishing a Firearm in Furtherance of a Crime of Violence]**

5. On or about December 7, 2023, in Albany County in the Northern District of New York, the defendant, **MUFID FAWAZ ALKHADER**, in furtherance of a crime of violence for which he may be prosecuted in a court of the United States, that is, obstruction of free exercise of religious beliefs with a dangerous weapon, in violation of Title 18, United States Code, Sections 247(a)(2) and 247(d)(3), knowingly possessed a firearm, that is, a Kel-Tec KS7 12-gauge pump shotgun bearing serial number QLF02, which was brandished, in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

### FORFEITURE ALLEGATION

1. The allegations contained in Count Three of this information are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

2. Upon conviction of the offense in violation of Title 18, United States Code, Section 924(c)(1)(A), as set forth in Count Three of this information, the defendant, **MUFID FAWAZ ALKHADER**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved in and used in any knowing commission of such offense, including but not limited to:

(1) one Kel-Tec KS7 12-gauge pump shotgun bearing serial number QLF02.

All pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c).

Dated: February 4, 2025

CARLA B. FREEDMAN  
United States Attorney

By: /s/ Richard Belliss & Alexander Wentworth Ping  
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Alexander P. Wentworth-Ping  
Assistant United States Attorneys  
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/s/ Trevor Kempner  
Trevor Kempner  
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